

IV. REMARKS

Claims 1-22 were presented for prosecution. Claims 1-4, 7-12, and 15-22 continue to be rejected under 35 USC 102(a) as being anticipated by Gunter Ollmann's "Custom HTML Authentication – Best Practices on Securing Custom HTML Authentication Procedures," hereinafter "Ollmann." Claims 5, 6, 13 and 14 were rejected under 35 USC 103(a) as being unpatentable over Ollmann in view of "Securing against Denial of Service Attacks (W3C). Applicant respectfully traverses the above rejections for the following reasons.

In forming the rejections the Office notes that portions cited in prior Office Actions are only what the Examiner considers most pertinent, and that "it is the reference in its entirety that has been used to reject Applicant's claims." However, under 35 CFR 1.104(c)(2), when "a reference ... *describes inventions other than that claimed by the applicant*, the particular part relied on must be designated as nearly as practicable." The reference in question teaches various approaches for handling HTML identification and authentication procedures. Applicant's claimed invention is not limited to dealing with login procedures, but deals with any type of request for a web resource. Accordingly, Applicant is entitled to know the specific passages that teach each and every aspect of the claimed invention, and merely relying on "the reference in its entirety" is clearly outside the bounds of 35 CFR 1.104(c)(2).

Beginning with claim 2, the Office interprets page 4, lines 12-14 to teach that the system for responding stops issuing HTTP "OK" response codes and issues no response after a predetermined number of improper requests are detected. Applicant submits that this passage, by itself or even when viewed in its entirety, fails to teach such a feature. This section teaches providing an automatic lockout *without informing the client* after a number of authentication failures. The reference to not informing the client does not teach or suggest stopping the

issuance of HTTP “OK” response codes. Rather, it clearly indicates that a login screen would simply be redisplayed even though the client has been locked out. This thus allows “the correct authentication information [to be] later provided” to let the client know “that the account is currently locked out.” When the paragraph is read *in its entirety*, it is clear that the paragraph could not reasonably be interpreted as stopping the issuance of HTTP “OK” response codes.

With regard to claim 4 (and claim 12), the Office states that it “would like to draw attention to portions of both the Ollmann and W3C references.” Claim 4 was not rejected based on the W3C reference either in a 102 or 103 rejection, so any citation to the W3C reference is improper in the context of the current Office Action and is not addressed herein. The cited portion of the Ollmann reference (page 8) refers to ensuring “that the content of the session ID is of the expected size and type.” A session ID is not a request, as recited in the claim. Instead, a session ID is an identifier used by the application (i.e., server) to identify the client browser. It is gathered by the server after the client successfully logs in so that the client does not have to re-login after each page request. See page 6, last two paragraphs. Accordingly, Applicant submits that claim 4 (and similarly claim 12) is not anticipated.

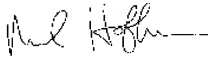
Claim 5 recites “wherein a request is deemed improper if an HTTP “post” or an HTTP “get” command is expected and neither an HTTP “post” nor an HTTP “get” command is received.” The Office Action alleges that page 10 of W3C teaches various packet types that should be refused access. Applicant sees no reference or suggestion to unexpected requests. In fact, the references only address **reply messages, not requests**. A similar argument applies for claims 6, 13 and 14. Accordingly, Applicant respectfully requests withdrawal of the rejections to these claims.

Claims 8, 10 and 17 are believed allowable for the reasons discussed above with claim 2. With regard to claim 1, Applicant recites “a system for detecting improper requests; and a system for responding to improper requests.” Conversely, Ollmann explicitly recites forcing “any error or unexpected request to generate a HTTP OK response.” Nowhere does Ollmann disclose a system for detecting “improper” requests. Accordingly, Applicant submits that claim 1 is not anticipated by Ollmann.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant’s undersigned representative at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael F. Hoffman", followed by a horizontal line.

Michael F. Hoffman
Reg. No. 40,019

Dated: 7/28/08

Hoffman Warnick LLC
75 State Street
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile